

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

JAVONNE QWANAE HUNT,  
a/k/a QUAD;  
WILLIAM CHRISTOPHER OLSEN; and  
JASEYONA SAGE THOMAS

**INDICTMENT**

Case No. \_\_\_\_\_

Violations: 21 U.S.C. §§ 841(a)(1),  
841(b)(1)(A), 841(b)(1)(B), and 846;  
and 18 U.S.C. § 2

**COUNT ONE**

**Conspiracy to Distribute and Possess with Intent to Distribute  
Controlled Substances**

The Grand Jury Charges:

Beginning in or about 2023 and continuing until in or about April 2024, in the  
District of North Dakota, and elsewhere,

JAVONNE QWANAE HUNT, a/k/a QUAD;  
WILLIAM CHRISTOPHER OLSEN; and  
JASEYONA SAGE THOMAS

knowingly and intentionally combined, conspired, confederated, and agreed with others,  
both known and unknown to the grand jury, to distribute and possess with intent to  
distribute controlled substances, including a mixture and substance containing a  
detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]  
propanamide”), a Schedule II controlled substance; in violation of Title 21, United States  
Code, Sections 841(a)(1) and 841(b)(1)(C).

Drug Quantity

With respect to JAVONNE QWANAE HUNT, a/k/a QUAD, the amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”) involved in the conspiracy attributable to this individual as a result of that individual’s own conduct, and the conduct of other conspirators reasonably foreseeable to that individual, is 400 grams or more of a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), in violation of Title 21, United States Code, Section 841(b)(1)(A).

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendants and others would and did distribute, and possess with intent to distribute, opiate pills and tablets containing a detectable amount of fentanyl in and about Bismarck, Mandan, and Minot, North Dakota, and elsewhere;
2. It was further a part of said conspiracy that the defendants and others would and did attempt to conceal their activities by, among other things, using aliases and concealing controlled substances within motor vehicles and containers;
3. It was further a part of said conspiracy that the defendants and others would and did use United States currency in their drug transactions;
4. It was further a part of said conspiracy that the defendants and others would and did use telecommunication facilities, including cellular telephones, and social media

applications, to facilitate the distribution of controlled substances and collection and transfer of drug proceeds;

5. It was further a part of said conspiracy that the defendants used other individuals and conspirators as sub-distributors of opiate pills and tablets containing a detectable amount of fentanyl;

6. It was further a part of said conspiracy that conspirators traveled in motor vehicles from North Dakota to Minnesota to acquire and obtain opiate pills and tablets containing a detectable amount of fentanyl for further distribution;

7. It was further a part of said conspiracy that in or about April 2024, the Defendant JAVONNE QWANAE HUNT, a/k/a QUAD, possessed opiate pills and tablets containing a detectable amount of fentanyl in a motor vehicle while in Burleigh County, North Dakota, and elsewhere;

In violation of Title 21, United States Code, Section 846, and Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

**Possession with Intent to Distribute Controlled Substances  
(40 grams or more Fentanyl)**

The Grand Jury Further Charges:

In or about April 2024, in the District of North Dakota, and elsewhere,

JAVONNE QWANAE HUNT, a/k/a QUAD,

individually, and by aiding and abetting, knowingly and intentionally possessed with intent to distribute a controlled substance, namely, opiate pills and tablets that were 40 grams or more of a mixture and substance containing a detectable amount of fentanyl (a/k/a “N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B); and Title 18, United States Code, Section 2.

A TRUE BILL:

/s/ Foreperson

Foreperson

/s/ Mac Schneider

MAC SCHNEIDER

United States Attorney

RLV/js